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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

META PLATFORMS, INC., a Delaware  
corporation,

Plaintiff/Counterclaim  
Defendant,

v.

BRANDTOTAL, LTD., an Israel  
corporation, and UNIMANIA, INC., a  
Delaware corporation,

Defendants/Counterclaim  
Plaintiffs.

Case No. 3:20-cv-07182-JCS

**META PLATFORMS, INC.'S  
STATUS REPORT**

1 Pursuant to this Court's January 10, 2022 Order (ECF No. 221), Meta Platforms, Inc.  
2 ("Meta") respectfully submits this response to the status report filed by Defendants BrandTotal,  
3 Ltd. and Unimania, Inc. ("BrandTotal") on January 14, 2022 (ECF No. 223).

4 1. On January 7, 2022, the deadline by which BrandTotal had previously agreed to  
5 produce documents, BrandTotal moved for relief from the joint stipulation that this Court entered  
6 on December 29, 2021. ECF No. 217. The Court denied that motion on January 10, 2022 and  
7 set a scheduling conference for that same day. ECF No. 219.

8 2. During the hearing, BrandTotal agreed to produce the documents required by the  
9 Court's December 29, 2021 Order on a rolling basis with a deadline for production of non-  
10 privileged documents and an initial privilege log by January 20, 2022. Following that hearing,  
11 the Court entered an order setting a deadline of January 20, 2022 by 5:00 PM PST for  
12 BrandTotal's final production of non-privileged documents and first privilege log. ECF No. 219.

13 3. In the seven days since that hearing, BrandTotal has produced no additional  
14 documents. BrandTotal now represents that it will make a "large production by January 18,  
15 2022, and will produce all remaining documents that do not hit on the privilege screen on  
16 January 20, 2022." ECF No. 223. Meta assumes that BrandTotal's January 20, 2022 production  
17 will also include the initial privilege log created by BrandTotal's computerized privilege screen.

18 4. BrandTotal also "proposes a deadline of a final privilege of January 28, 2022."  
19 Meta has no objection to that date, provided that BrandTotal intends to produce a final privilege  
20 log and any non-privileged documents that were inadvertently included on the first privilege log  
21 by January 28 (it is not clear to Meta from BrandTotal's status report if it intends to produce the  
22 documents *and* log by that date). Given the re-deposition window of January 26, 2022 through  
23 February 4, 2022, Meta also respectfully requests that BrandTotal be ordered to produce  
24 documents inadvertently included on the first privilege log on a rolling basis from January 20  
25 through January 28.

1 Dated: January 17, 2022

2 By: /s/ Sonal N. Mehta  
3 Sonal N. Mehta

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**CERTIFICATE OF SERVICE**

I hereby certify that on January 17, 2022, I electronically filed the above document with the Clerk of the Court using CM/ECF which will send electronic notification of such filing to all registered counsel.

Dated: January 17, 2022

By: /s/ Sonal N. Mehta  
Sonal N. Mehta